

interfering signal). For typical system operation, the ETS power level will be at least 20 to 30 dB below 100 milliwatts, translating into a distance of 1-3 feet away from a TV receiver for any potential interference to occur. Given the infrequency of ETS activation and the rapid rate that the tag transmitter moves, the likelihood of such interference occurring is highly unlikely.<sup>46</sup>

ProNet and MSTV have had preliminary discussions on this issue. However, MSTV will not comment on ProNet's proposal until it completes its engineering evaluation.

#### B. AMTS

ProNet's proposed reallocation for ETS in the 218-219 MHz band is consistent with the maritime reallocation for AMTS because, as a secondary service, it would not cause harmful interference.<sup>47</sup> Watercom, in its comments on the Petition, disagrees, claiming that such interference would occur.<sup>48</sup> In its Reply, ProNet shows that Watercom's concerns are without merit because ETS' limited activation time and its transient operation reduce the potential for interference occurring, and because the geographic distribution of AMTS stations makes it virtually impossible for their operation to be disrupted by ETS transmitters.<sup>49</sup>

ProNet's decision to pursue reallocation of the 216-217 MHz band, in large part, results from Watercom's express suggestion that this band would be more compatible than the 218-219 MHz band with ETS and with AMST operations:

[S]hould particular channelization be deemed by the Commission to be appropriate and necessary [for ETS], WATERCOM believes that such channelization should occur in the AMTS "Group D" shore station transmit band, 216.0-216.5 MHz. [G]ood spectrum

---

<sup>46</sup>See also Petition at 33-34.

<sup>47</sup>47 C.F.R. Section 90.75; Petition at 31-32.

<sup>48</sup>Watercom Comments in RM-7784 (Sept. 26, 1991) at 3-5.

<sup>49</sup>ProNet Reply at 14-16.

planning would dictate that the AMTS Group D shore station channels would make an appropriate home for the ETS.<sup>52</sup>

Nothing has occurred since Watercom filed its comments to change this recommendation.

ETS operation on the 216.70-216.95 MHz channels would not interfere with AMTS. The first adjacent AMTS channel is located at 217.0125 MHz, which is a high-power, coast-to-ship base station transmit channel. The corresponding AMTS receive channels typically are located offshore. Assuming that ETS operates at a power level of 10 milliwatts ERP, and assuming, in the very best case scenario, that the transmitter is operating in an open area (normally, ETS transmitters operate in an enclosed environment, dramatically reducing ERP), the tag would have to be within 0.3 miles from an AMTS receiver for potential interference to be detected. Moreover, the high AMTS transmit power immediately would capture any AMTS receiver and would override completely any ETS signal. Under these circumstances, with the offshore location of most AMTS receivers, the potential for interference is virtually non-existent.

C. IVDS, 220 MHz and Amateur licensees

Provision of ETS on the 216-217 MHz band would not cause harmful interference to IVDS and amateur licensees operating in the 216-220 MHz band or to 220-222 MHz licensees. Licensees in each of these services are allowed to operate at a high power level. Specifically, IVDS is authorized up to 20 watts ERP, amateur service will be authorized up to 50 watts PEP, and 220-222 MHz service is authorized up to 100 watts ERP. When compared to the low power level proposed for ETS, the signal-to-noise ratio for any of these adjacent services will result in

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<sup>52</sup>Watercom Comments at 4-5. When Watercom suggested that ETS be authorized on the 216.0-216.5 MHz band, it did so because it then expected that IVDS only would be authorized on the 218.0-218.5 MHz band. This allocation would make the 216.0-216.5 MHz band unavailable for AMTS. However, the entire 216-219 MHz band ultimately was allocated for IVDS, making the entire 216-217 MHz band unavailable for AMTS. Thus, the same reason for Watercom's original recommendation still applies.

their transmitter immediately capturing their corresponding receiver and eliminating any potential interfering ETS signal.

#### V. THE COMMISSION MUST REALLOCATE PERMANENT SPECTRUM FOR ETS

Since filing its Petition in July 1991, the need for a permanent reallocation of spectrum assigned to ETS has remained unabated. The ability of law enforcement agencies to combat serious crime, such as bank and jewelry store robberies, especially with more pronounced budget cuts, unfortunately is decreasing.

The record of this proceeding is singular in its support for ETS. Numerous testimonials by the FBI, law enforcement agencies, banks, and other merchants uniformly attest to the effectiveness and the need for ETS.<sup>53</sup> Loss of ETS would be a disaster:

- The Huntington Beach police department believes that "if the failure to grant ETS a permanent spectrum results in some change or loss of that service, our agency, the community and law enforcement in general will have lost a unique and effective crime-fighting tool."
- The Bellingham police department states that, without ETS, "[w]e will have taken a step backward in our technological efforts. We will be forced to return to a situation [where] we are depending on blind luck or the perpetrator's ineptitude to make a capture instead of being able to rely on electronic technology that is proven to be effective."<sup>54</sup>

ETS has been in regulatory limbo long enough. Time is running out. New technologies are being established that threaten the continued availability of ETS. If the Commission fails to reallocate the 216-217 MHz band, ETS will not be available. The public will suffer.

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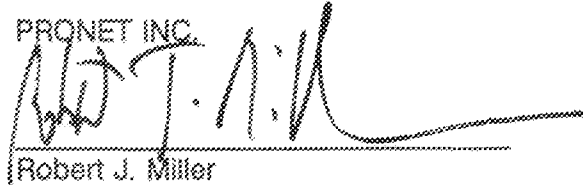
<sup>53</sup>See Attachment B.

<sup>54</sup>*Id.*

Thus, for the reasons set forth herein, ProNet respectfully requests that the Commission establish ETS as a low power radio service under Part 90 and reallocate six (6) channels from 216.70 to 216.95 MHz for ETS.

Respectfully submitted,

PRONET INC.



Robert J. Miller  
Gardere & Wynne, L.L.P.  
1601 Elm Street, Suite 3000  
Dallas, Texas 75201  
(214) 999-4219

Date: October 26, 1993

Its Attorney

158783/gw/00

A

# ProNet Tracking Systems

## Cities Installed

### **Southern California**

#### **Long Beach:**

Signal Hill

#### **Los Angeles County:**

Artesia  
Bellflower  
Cerritos  
City of Industry  
Downey  
Hawaiian Gardens  
La Mirada  
Lakewood  
Norwalk  
Paramount  
Santa Fe Springs

#### **Orange County:**

Anaheim  
Brea  
Buena Park  
City of Orange  
Costa Mesa  
Cypress  
Corona Del Mar  
El Toro  
Fountain Valley  
Fullerton  
Garden Grove  
Huntington Beach  
Irvine  
La Palma  
Los Alamitos  
La Habra  
Laguna Niguel  
Laguna Hills  
Mission Viejo  
Newport Beach  
Placentia  
Santa Ana  
San Clemente  
San Juan Cap.  
Seal Beach  
Stanton  
Tustin

#### **Orange Co. (cont)**

Villa Park  
Westminster  
Yorba Linda

#### **Pasadena**

### **Northern California**

#### **Fresno:**

Clovis

#### **Oakland:**

Berkeley

#### **Sacramento:**

Carmichael  
Citrus Heights  
Elk Grove  
Fair Oaks  
Folsom  
Gold River  
Rancho Cordova  
Rio Linda  
Roseville

#### **San Francisco**

### **Northwest**

#### **Bellingham**

#### **Portland:**

Gresham  
Multnomah  
Washington Co.

#### **Tacoma**

### **Southwest**

#### **Las Vegas:**

N. Las Vegas

#### **Phoenix**

#### **Tucson**

#### **Southwest (cont)**

Scottsdale, Mesa, Tempe

#### **Reno:**

Carson City  
Centerville  
Douglas  
Dresserville  
Gardnerville  
Minden  
Sparks  
Sun Valley  
Washoe

### **Texas**

#### **Austin:**

Roundrock

#### **Dallas:**

Addison  
Carrollton  
Richardson

#### **Houston:**

Hedwig Village  
Spring Branch

#### **San Antonio:**

Windcrest  
Alamo Heights

### **Other**

#### **Anchorage**

#### **Puerto Rico:**

Island of Puerto Rico  
San Juan

#### **Little Rock:**

Sherwood  
Jacksonville  
N. Little Rock

**Future Tracking Installations  
Approved for Scheduling**

City

Police Department

Fort Worth, TX

Fort Worth PD

Pierce County, WA

Pierce County PD

Seattle, WA

Seattle PD

Atlanta, GA

Atlanta PD

San Diego, CA

San Diego PD

Baltimore, MD

Baltimore PD

Greenville, SC

Greenville PD

Raleigh, NC

Raleigh PD

Fort Lauderdale, FL

Fort Lauderdale PD

Knoxville, TN

Knoxville PD

Miami, FL

Miami PD

Nashville, TN

Nashville PD

# LAW ENFORCEMENT AGENCIES

## ALASKA

Anchorage Police Department

## ARIZONA

Mesa Police Department  
Phoenix Police Department  
Scottsdale Police Department  
Tempe Police Department  
Tucson Police Department

## ARKANSAS

Little Rock Police Department  
N. Little Rock Police Department  
Sherwood Police Department  
Jacksonville Police Department

## CALIFORNIA

Anaheim Police Department  
Berkeley Police Department  
Brea Police Department  
Buena Park Police Dept.  
City of Orange Police Department  
Clovis Police Department  
Costa Mesa Police Department  
Cypress Police Department  
Downey Police Department  
Fountain Valley Police Dept.  
Fresno Police Department  
Fullerton Police Department  
Garden Grove Police Department  
Huntington Beach Police Dept.  
Irvine Police Department  
La Habra Police Department  
La Palma Police Department  
Long Beach Police Department  
Los Alamitos Police Dept.  
Los Angeles Co. Sheriff's Office  
Newport Beach Police Dept.  
Oakland Police Department  
Orange County Sheriff's Dept.  
Pasadena Police Department  
Placentia Police Department  
Roseville Police Department  
Sacramento Police Department  
Sacramento Co. Sheriff's Office  
San Clemente Police Dept.  
San Francisco Police Department  
San Francisco Sheriff's Office  
Santa Ana Police Department

## CALIFORNIA (con't)

Seal Beach Police Department  
Signal Hill Police Department  
Tustin Police Department  
Westminster Police Department

## NEVADA

Carson City Police Department  
Douglas Co. Sheriff's Office  
Las Vegas Police Department  
Minden/Gardenville Police Dept.  
N. Las Vegas Police Department  
Reno Police Department  
Sparks Police Department  
Washoe County Sheriff's Dept.

## OREGON

Beaverton Police Department  
Gresham Police Department  
Hillsboro Police Department  
King City Police Department  
Multnomah County Sheriff's Office  
Portland Police Bureau  
Tigard Police Department  
Tualatin Police Department  
Washington Co. Sheriff's Office

## PUERTO RICO

Puerto Rico Police Department  
San Juan FBI

## TEXAS

Addison Police Department  
Austin Police Department  
Carrollton Police Department  
Dallas Police Department  
Farmers Branch Police Dept.  
Hedwig Village Police Department  
Highland Park Police Department  
Houston Police Department  
Richardson Police Department  
San Antonio Police Department  
Spring Valley Police Department  
The Villages Police Department  
University Park Police Dept.  
Windcrest Police Department

## WASHINGTON

Bellingham Police Department  
Tacoma Police Department





# Bank Robbery Statistics

## *PTS Cities*

City	Bank Robberies Year Before PTS Installation	Bank Robberies After Install - 3 Year Average ('89, '90, '91)	Difference / %
San Francisco	281	157	(-124) / (44%)
Las Vegas	76	57	(-19) / (25%)
Anchorage	18	8	(-10) / (56%)
Austin	28	12	(-16) / (57%)
Sacramento	125	65	(-60) / (48%)
Dallas	90	32	(-58) / (64%)
Reno	13	17	+4 / 30%
<u>1991 Actual</u>			
*Houston	57	61	+4 / 1%
*Portland	254	92	(-162) / (64%)
*ORCO/S. CA.	319	193	(-126) / (39%)

<b>Total: 10 Cities</b>	<b>1,262</b>	<b>694</b>	<b>(-571) 45% Decrease</b>
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\* Cities have not been in operation for three years

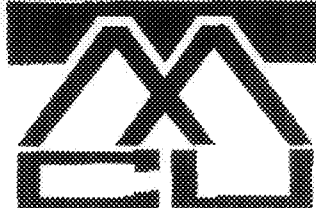
Source: FBI and Local Law Enforcement Agencies

LAWSTAT/2kam

## PTS Financial Institution Statistics

	1992	1993 YTD	12 Month Total (Oct. '92-Sept. '93)
Incidents Involving Tags	328	284	369
Apprehensions	149	128	171
% Of Total	45%	45%	46%
Dollars Taken	\$1,514,562	\$1,734,951	\$2,195,513
Dollars Recovered	\$947,946	\$1,150,402	\$1,465,063
% Of Total	63%	66%	67%
Average Track Time Per Apprehension (minutes)	16	30	21

# MULTCO CREDIT UNION



MAIN OFFICE  
(503) 248-3076  
(503) 248-3548 FAX  
4110 S.E. Hawthorne Blvd.  
Portland, OR 97214-5292

MEAD BRANCH  
(503) 248-3020  
FAX (503) 248-3120  
LOWER LEVEL  
421 SW Fifth Avenue  
Portland, OR 97204-2238

Ms. Donna H. Scarcy, Secretary  
Federal Communications Commission  
1919 M. Street N.W. Room 222  
Washington, D.C. 20036

2-27-92

RECEIVED  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY

MAR 2 1992

RE: The matter of a Pioneer's Preference for ProNet's electronic tracking service.

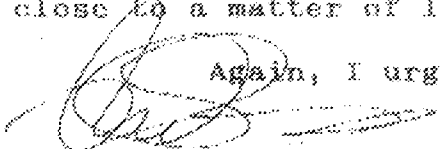
File PP-23, RM-7784

Multco Credit Union would like to support the granting of Pioneer's Preference relative to ProNet Inc.'s electronic tracking system (ETS). Our credentials for supporting the ETS are basic. In the three years prior to installation, our small credit union had been the victim of six bank robberies, including one multi-teller incident and two where weapons were displayed.

To maintain and enhance the level of service provided to financial institutions, I am asking that the FCC provide permanent spectrum in the 216-2320 MHz band and authorize ProNet to operate under the Business Radio Services rules and Pioneer's Preference.

Bank robberies across the nation are increasing in violence. Within the past four years, there have been two fatalities during the commission of bank robberies in our Metropolitan area. Since the installation of an ETS in the Portland, Oregon eighteen months ago, bank robberies have decreased while both apprehensions and convictions have increased. In the state with the highest rate of bank robbery in the nation, this type of service provided by ProNet is quite close to a matter of life and death.

Again, I urge favorable consideration in this case.

  
Robert Burns  
Manager

BELLINGHAM

**BNB**

NATIONAL BANK

P.O. Box 6  
Bellingham, Washington 98227

February 21, 1992

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M. Street N.W. Room 222  
Washington, DC 20036

Re: In the matter of a request by ProNet Inc. for a grant  
of a Pioneer's Preference for its Electronic Tracking  
Service File No. PP-23 RM-7784

Dear Ms. Searcy:

Bellingham National Bank hereby submits its comments in support  
of the above referenced request for a Pioneer's Preference filed  
by ProNet, Inc.

1. Bellingham National Bank has seventeen bank branches located in four counties in Washington State. Because of our vulnerabilities to robberies and increase in bank robberies, we are interested in using the available technology to assist the police in the apprehension of bank robbers.
2. We became familiar with ProNet, Inc. after a Robbery Task Force was formed in our city due to an increase of bank robberies in our area. Bellingham National Bank entered into a contract with ProNet, Inc. in October 1991. In November, 1991, we experienced a robbery that resulted in a criminal capture and recovery of stolen funds.
3. We are familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY

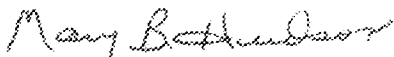
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Donna R. Searcy  
February 21, 1992  
Page Two

4. Bellingham National Bank supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:
- A. The ETS has been proven to be a critical tool in the apprehension of criminals.
  - B. The apprehension of our bank robbers has been very unsuccessful until we employed the ETS in our branches.
  - C. The technology that has been provided by ProNet in the Electronic Tracking Systems has contributed to satisfying a need in the banking community to assist police in the apprehension of bank robbers. There is an increasing need for sophisticated security technologies in today's world and ProNet is answering that need.
  - D. If ProNet's ETS is not provided permanent spectrum and is not granted a Pioneer's Preference, the setback to fighting crime in the banking communities using this system would be immeasurable. Bank employees now feel they have a good, safe tool to use in the event of a robbery. Again, in this age of heightened concern for safety to person and property, there is an increasing need for sophisticated security technologies.

Sincerely,



Mary B. Hudson  
AVP/Financial Operations

MH:sk  
cc: Larry Scodeller

FEDERAL RESERVE BANK OF SAN FRANCISCO  
101 MARKET STREET, SAN FRANCISCO, CALIFORNIA 94105

February 24, 1992

Ms. Donna R. Scarcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20036

Dear Ms. Scarcy:

Reference: In the matter of a request by ProNet, Inc.,  
for grant of a Pioneer's Preference for its  
Electronic Tracking Service

File #PP-23, RM-7784

I am the Vice President for District Security for the Federal Reserve Bank of San Francisco and was a member of a joint Federal Regulatory Agency Group which revised and updated the Regulations implementing the Bank Protection Act of 1968 (12 USC 1882). Regulations promulgated by the Federal Reserve Board can be found, beginning at 12CFR 216.1.

The Federal Reserve Bank of San Francisco has no business relationship with ProNet and does not use any of its products.

The Federal Reserve Bank of San Francisco is responsible to ensure that banks under its supervision comply with appropriate regulations, including the Bank Protection Act. The regulations promulgated under 12CFR 216.1 require banks to have a written security program to protect against robberies, burglaries, and larcenies and procedures to assist in identifying and apprehending persons who commit such acts. The security program, Section 216.3 (a)(2) suggests the procedures may include, but are not limited to "using identification devices, such as pre-recorded serial numbered bills, or chemical and electronic devices". One of the electronic devices contemplated by this language is an electronic tracking device.

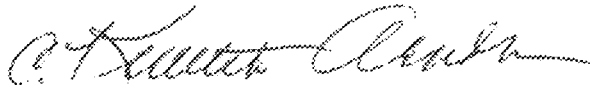
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COMMUNICATIONS SECTION

Page 2

While the Federal Reserve Bank does not endorse commercial products, it does support initiatives by banks which will achieve the goal of minimizing crimes against financial institutions and assisting in identifying those responsible. Anecdotal evidence from Federal, State and local law enforcement representatives indicates that electronic tracking devices have proven successful in this effort.

It is requested you take the comments contained in this letter into consideration in reaching your decision on ProNet's Petition for Rulemaking.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. Kenneth Arnold", written in a cursive style.

C. Kenneth Arnold  
Vice President  
District Security



NationsBank Services, Inc.  
Security Department  
P. O. Box 831979  
Dallas, TX 75283-1979  
Tel 214 508-6222

**NationsBank**

"STAMP AND RETURN"

February 25, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M. Street N.W., Room 222  
Washington, D.C. 20036

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COMMISSION  
OFFICE OF THE  
SECRETARY

REFERENCE: In the matter of a request by ProNet, Inc. for  
grant of a Pioneer's Preference for its  
Electronic Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

We wish to express our support of the above referenced Request  
for a Pioneer's Preference filed by ProNet, Inc.

NationsBank began using the ProNet robbery tracking system in  
Austin, Texas in 1985, and has expanded use of the tracking  
system to the Dallas and Houston communities where it has  
become available. We have found the ProNet tracking devices  
to be a highly effective robbery deterrent. The number of our  
Bank robberies and robbery losses have been significantly  
reduced in those areas where the ProNet devices are in use.  
Use of the tracking devices has also resulted in an increase  
in the number of robbers that have been arrested and  
convicted, that typically would not have been apprehended. We  
feel the ProNet Tracking System is the most effective loss  
prevention tool currently available to safeguard the Bank's  
assets, customers, and employees.

I am familiar with ProNet's request and its Petition for  
Rulemaking to provide permanent spectrum in the 216-220 MHz  
band for the Electronic Tracking System (ETS) to operate under  
the Business Radio Service rules and I fully support that  
request.

NationsBank supports the grant of a Pioneer's Preference (and  
Rulemaking) to ProNet because:

1. This is a critical law enforcement tool since it  
assists in the apprehension and conviction of  
dangerous felons and the recovery of the Bank's  
assets.

2. This technology is unique and effective in that it allows law enforcement to track and apprehend the robber away from the Bank's premises thus promoting safety to our customers and employees.

NationsBank would lose a significant bank robbery prevention tool if the FCC actions were not favorable towards granting ProNet's request for a Pioneer's Preference. Loss of this valuable service would, in my judgement, be detrimental to reducing the incidence of violent crime in our communities.

Sincerely,



Robert D. Sanders  
NationsBank Texas Security  
214/508-6270

ch

Associated Industries  
**Service**  
**MERCHANDISE**

February 20, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

Reference: In the matter of a request by ProNet, Inc. of a Pioneer's Preference for its Electronic Tracking Service.  
File #PP-23, RM-7784

Dear Ms. Searcy:

Service Merchandise Company, Incorporated hereby submits its Comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet, Inc.

- 1) Service Merchandise is a 3.5 billion dollar corporation doing business throughout the United States. Our primary sales are in fine jewelry items with high value. Because of the nature of our business we are exposed to criminal efforts with some frequency, thus our interest in the above referenced matter.
- 2) Our relationship with the ProNet Corporation began in 1991 in an effort to address a very serious problem with armed robberies and related gang activity in our southern California market. Based on this limited test, we are preparing to expand our utilization of this technology to other areas of the country.
- 3) We are familiar with ProNet's request and its petition for Rulemaking to provide a permanent spectrum in the 216-220 MHz band for ETS. We understand that this will authorize ETS to operate under the Business Radio Service rules and we fully support this request.
- 4) Service Merchandise Company, Incorporated supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:
  - a) We believe this technology to be the most innovative and promising tool available to reduce a very serious and expensive form of crime which exposes our employees and customers to the threat of bodily harm.

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SECRETARY

Ms. Donna R. Searcy  
February 20, 1992  
Page 2

- b) It is my opinion as an expert in the field of security and loss prevention that expanded use of these devices will eventually result in substantially reduced crimes of this nature because the devices will, very simply, make the likelihood of apprehension too great.
- c) There is no other technology available which provides the advantages of ETS both to the retailer and to law enforcement. Full utilization of this technology is very desirable because of the increase in criminal incidents. Service Merchandise experienced a twofold increase in robberies from 1990 to 1991. We are looking to this technology to help us reduce these losses.
- d) It is our opinion that ETS is becoming a critical component in the spectrum of responses to an increasing crime problem and that it must be included in any responsible loss prevention/security effort involving high value merchandise.

Thank you for your consideration of this request.

Sincerely,

SERVICE MERCHANDISE COMPANY, INCORPORATED



Steve Baker  
Operating Vice President  
Loss Prevention

SB/ws

**PRIMERIT**  
BANK

*Primerit Bank, Federal Savings Bank  
Post Office Box 98500  
Las Vegas, Nevada 89193-8500  
TEL. 502-5944*

*J. Roger Outlette  
Director of Security*

OFFICE OF THE  
SECRETARY  
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COMMISSION

MAR 2 '92

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February 24, 1992

Ms. Donna R. Scarcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

RE: A request by ProNet Inc., for grant of a Pioneer's  
Preference for its Electronic Tracking Service

File # PP-23, RM-7784

Dear Ms. Scarcy:

PriMerit Bank, Federal Savings Bank hereby submits its comments in support of the above-referenced Request for a Pioneer's Preference filed by ProNet Inc.

As Director of Security for PriMerit Bank, I have been involved with ProNet and their services since 1989. ProNet is presently providing PriMerit Bank with its tracking device in 95% of our branches. However, we will soon have 100% service when ProNet's expansion is completed in the Phoenix, Arizona area.

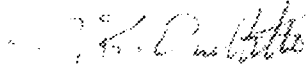
PriMerit Bank has been involved with ProNet tracking devices since 1985. As a result, for the past twelve months we have recovered 84% in dollars from robberies. Also, we have an 83% apprehension rate as a result of using the ETS tags. For this reason, it is essential that ProNet be granted a Pioneer's Preference.

I am familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band, for ETS and to authorize ETS to operate under the Business Radio Service rules. PriMerit Bank fully supports this request.

PriMerit Bank will continue to use ProNet's ETS tags and their technology to assist this bank in the apprehension and conviction of bank offenders.

PriMerit Bank supports the grant of a Pioneer's Preference to ProNet since this is a critical law enforcement tool and a real asset to banking, for the recovery of monies and the apprehension and conviction of criminals.

Sincerely,

  
J.R. Ouellette

JRO:lam

**First  
Interstate  
Bank**

First Interstate Bank  
of Oregon, N.A.  
Security Services  
P.O. Box 3131  
Portland, OR 97208-3131  
503 225-3910  
FAX 220-2823

William L. Bell  
Vice President

February 28, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20036

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY

Mar. 2 '92

RECEIVED

REFERENCE: In the matter of a request by PRONET, Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service.

File #PP-23, RM-7784

Dear Ms. Searcy:

The Security Services Department of First Interstate Bank of Oregon, Northwest Region, submits the following comments in support of the request by PRONET, Inc. for a permanent license and a grant of Pioneer's Preference.

We are a user of the Electronic Tracking Service within the city limits of Portland and have participated in the program since July, 1991. Tracking devices are presently installed in 23 of our branches to assist in the apprehension of robbery suspects.

Participation in the tracking program has had a significant impact in the reduction of robberies at First Interstate Bank. We had a 38% decrease in robberies during 1991 and attribute this decrease to the use of the tracking devices. Law enforcement officers have arrested 10 of our robbers and recovered in excess of \$30,000 since July of 1991. We strongly believe that future developments in technology will increase the effectiveness of the tracking devices resulting in additional apprehensions.

We are aware of PRONET's request and its petition for rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS and to authorize ETS to operate under the business radio service rules and we fully support this request.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Bell", written over the typed name.

William L. Bell  
Security Director

WLB:skb





Police Department

## City Of Tustin

February 28, 1992

300 Centennial Way  
Tustin, CA 92680  
(714) 544-5424  
FAX (714) 730-5134

Ms. Donna R. Searsy, Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

REFERENCE: In the matter of a request by Pro Net, Inc., for grant of a Pioneer's Preference for its Electronic Tracking Service. File #PP-23, RM-7784.

Dear Ms. Searsy:

The Tustin Police Department hereby submits its comments in support of the above referenced request for a Pioneer's Preference filed by Pro Net, Incorporated.

The Tustin Police Department's jurisdiction is approximately 15 square miles with a growing populous currently at 55,000. We have a large number of banks and as such, are subject to more than our share of armed robberies of these facilities. The ETS System, provided and administered by Pro Net, provides us with a much needed tool in combatting this ever-increasing problem.

We have utilized Pro Net's Tracking System for the past three years and have found it to be reliable and extremely useful. The company itself has always been very responsive and pro-active to all our needs and requests.

We would support Pro Net's request and petition to be provided with a permanent spectrum in the 216-220 MHZ band in order to continue to operate the ETS System. Failure to do so, and the corresponding loss of the ETS System, would certainly be a major setback in law enforcement's efforts to deal with armed robberies.

If you should have any additional questions, please feel free to contact me.

Sincerely,

W. DOUGLAS FRANKS  
Chief of Police

A handwritten signature in cursive script, appearing to read "Steve Foster".

Steve Foster, Captain  
Operations Division Commander

WDF:SF:dh